

EXHIBIT 2

DISTRICT COURT, ARAPAHOE COUNTY, STATE OF COLORADO 7325 S Potomac St #100 Centennial, CO 80112	
Plaintiffs: CODY LEBLANC a 2024 delegate to the 2024 State Republican Assembly and Convention, et al. v. Defendants: COLORADO REPUBLICAN STATE CENTRAL COMMITTEE (“CRC”), BRITA HORN, in her official capacity as chairman of the CRC	▲ FOR COURT USE ONLY ▲
<i>Pro Se Plaintiff:</i> Name: Cody LeBlanc Address: 265 Fulton Avenue Fort Lupton, CO 80621 Phone No: 303-720-2350 Email: Cody.leblanc.personal@gmail.com	Case No: 2025CV367 Division: 31
Declaration of Weston D. Imer	

I, **Weston D. Imer**, being of sound mind and over the age of eighteen, hereby declare and state under penalty of perjury as follows:

1. I am a duly elected member of the **Colorado Republican State Central Committee (CRC)**. I make this declaration based on my personal knowledge and direct participation in the CRC meeting held on **Saturday, September 27, 2025**.
2. I was physically present for the entirety of the meeting and personally recorded it on video, which has since been made publicly available for viewing at the following link:
<https://www.youtube.com/live/0USAfGM2 Jk?si=u4cUJHtnlK-qSUAe&t=17957>

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3. The recording is an accurate and unaltered representation of the events that occurred during the meeting. Aside from the invocation and Pledge of Allegiance being omitted due to initial audio issues, no material portions of the meeting were edited or removed in the publicly available version.
4. During that meeting, Chairwoman **Brita Horn** introduced a motion to be voted upon by the body regarding legal representation of the CRC in ongoing litigation. Chairwoman Horn read the motion aloud as follows:

“Shall Brita Horn’s personal defense attorney be dismissed as the CRC attorney because he is attempting to unethically represent both the Plaintiff (CRC) and the Defendant (Brita Horn) in the CRC’s litigation and instead allow the CRC Legal Affairs Committee to choose an unbiased next general counsel for the CRC?”

5. Chairwoman Horn then called for a **voice vote**, first requesting “all those in favor,” followed by “all those opposed.” The body responded with an audible and overwhelming majority of **ayes**.
6. Immediately thereafter, Chairwoman Horn stated:

“Okay... passes... passes.”

This statement confirmed that the motion carried and that **Steven Klenda / Klenda Legal LLC** was dismissed as legal counsel for the **Colorado Republican State Central Committee**.

7. I personally witnessed the motion, the vote, and the Chair’s declaration of passage. The relevant segment of the recording begins at approximately **4 hours, 59 minutes, and 19 seconds** into the video linked above.
8. Based on my direct observation and documentation of the proceedings, it is my unequivocal understanding that the **CRC membership, acting as a duly convened body, voted to dismiss Steven Klenda / Klenda Legal LLC as counsel for the CRC on September 27, 2025.**
9. Since that time, the **CRC membership has not been provided with official minutes from the September 27, 2025 meeting.** A version of minutes has been circulated and even referenced in court filings, but that document contains **multiple factual errors and misrepresentations** of what occurred. It has **not been reviewed, corrected, or approved by the State Central Committee**, and therefore cannot be regarded as an official or accurate record of the meeting.

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

SWORN AND AFFIRMED under penalty of perjury this 7th day of October 2025.

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Weston D. Imer

Jefferson County Bonus Member
Colorado Republican State Central Committee

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Declaration of James Peabody	

I, **James Peabody**, being of sound mind and over the age of eighteen, declare the following under penalty of perjury:

1. I currently serve as a **Bonus Member of the Colorado Republican State Central Committee (CRC)**, representing the 90,811 active republican voters of **Jefferson County**. I have been active in Party matters for many years and was present at the meeting of the CRC held on **Saturday, September 27, 2025**.
2. I attended the full meeting in person. Like several others, I recorded the proceedings to preserve an accurate account of the day’s events. My recording captures the complete context of the votes taken, including the final motion concerning the CRC’s legal counsel.

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3. My recording has been uploaded and made publicly available for reference and transparency at the following link:
<https://rumble.com/v700k46-scc-vote-to-remove-britas-personal-attorney.html>

4. During that meeting, Chairwoman **Brita Horn** read the following motion to the body:

“Shall Brita Horn’s personal defense attorney be dismissed as the CRC attorney because he is attempting to unethically represent both the Plaintiff (CRC) and the Defendant (Brita Horn) in the CRC’s litigation and instead allow the CRC Legal Affairs Committee to choose an unbiased next general counsel for the CRC?”

5. Chairwoman Horn then called for a **voice vote**. The room responded decisively — the “ayes” were loud, clear, and unmistakably dominant. The vote was **orderly, intelligible, and properly conducted**, and there was no confusion in either the process or the outcome.

6. Following the vote, Chairwoman Horn stated aloud:

“Okay... passes... passes.”

Her words confirmed to everyone present that the motion had carried and that **Steven Klenda / Klenda Legal LLC** was no longer serving as the attorney for the Colorado Republican State Central Committee.

7. I was standing close enough to both see and hear this exchange clearly. There was no ambiguity in the Chair’s declaration or the body’s response.
8. My recording of this portion of the meeting accurately reflects these events. It aligns with what appears in Mr. Imer’s recording and truthfully represents what took place.
9. To date, the **CRC membership has not received the minutes from the September 27, 2025 meeting**. The version submitted to this court contains **numerous factual inaccuracies and misstatements** and has **not been reviewed, corrected, or adopted by the body**. Therefore, no official minutes exist that can be relied upon as an accurate record of that meeting.
10. Based on my firsthand observation and the clear, documented proceedings, it is my firm understanding that the **CRC membership, acting as a duly assembled body, voted to dismiss Steven Klenda / Klenda Legal LLC as counsel for the Colorado Republican State Central Committee on September 27, 2025.**

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

SWORN AND AFFIRMED under penalty of perjury this 7th day of October 2025.

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A handwritten signature in blue ink, appearing to read 'James Peabody', is written over a solid black horizontal line.

James Peabody

Jefferson County Bonus Member
Colorado Republican State Central Committee